

2009 NOV -5 PM 3:57

SOUTHERN DISTRICT OF CALIFORNIA

BY _____ DEPUTY

Attorneys for Defendants,
SAXON MORTGAGE SERVICES, INC. (erroneously named as “Saxon Mortgage”)
and MORTGAGE ELECTRONIC REGISTRATION SYSTEMS (‘erroneously named
as “MERS”)

JOSE R ORTEGA,
Plaintiff,

VS.

NEW CENTURY MORTGAGE CORP,
MERS, SAXON MORTGAGE,
QUALITY LOAN SERVICE CORP,
SD REALTY INC AND ALL
SUCCESSORS IN INTEREST; and
Does 1-20,

Defendants.

) Case No.:
) '09 CV 2487 BEN BLM
)
) JOINDER IN NOTICE OF
) REMOVAL OF ACTION
) PURSUANT TO 28
) U.S.C. §1441(b)--(Federal Question)
)
)
) [Filed concurrently with Notice of
) Removal]

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA:**

PLEASE TAKE NOTICE that undersigned named Defendant hereby joins in Defendants' SAXON MORTGAGE SERVICES INC. ("Saxon") and

1 MORTGAGE ELECTRONIC REGISTRATION SYSTEMS ("MERS") Notice of
2 Removal to this Court of the state court action in the Superior Court of the State of
3 California, for the County of San Diego, entitled *Ortega v. New Century Mortgage*
4 *Corp., et al.*, Case No. 37-2009-00098974-CU-WE-CTL. A true and correct copy of
5 the Complaint is attached to the Notice of Removal as Exhibit "1."

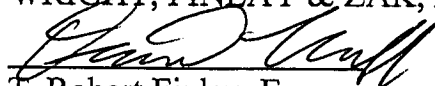
6 The first date upon which any of the undersigned were served with a copy of
7 that Complaint, if at all, was less than thirty (30) days ago.

8 Respectfully submitted,

9 WRIGHT, FINLAY & ZAK, LLP

10 Dated: October 29, 2009

By:


11 T. Robert Finlay, Esq.

12 David L. Chaffin, Esq.

13 Attorneys for Defendants,

14 SAXON MORTGAGE SERVICES, INC.

(erroneously named as "Saxon Mortgage")

15 and MORTGAGE ELECTRONIC

16 REGISTRATION SYSTEMS (erroneously
named as "MERS")

17
18 I HEREBY CONSENT TO, AND JOIN IN, THE REMOVAL OF THIS ACTION
19 FROM THE SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR SAN
20 DIEGO COUNTY TO THE UNITED STATES DISTRICT COURT FOR THE
21 SOUTHERN DISTRICT OF CALIFORNIA FOR THE REASONS STATED IN
THE NOTICE OF REMOVAL.

22 MCCARTHY HOLTHUS, LLP

23 Dated: October 28, 2009

By:


24 David C. Scott, Esq.

25 Attorneys for Defendant,

26 QUALITY LOAN SERVICE CORP.